

REMARKS

Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested.

Claims 1, 11, 18, 28 and 29 have been amended for clarification purposes only. Support for the amendments to claims 1, 11, 18, 28 and 29 may be found, for example, in FIG. 2A of the present patent application. No new matter has been added.

Accordingly, after entry of this Amendment, claims 1-29 will remain pending in the patent application.

It is respectfully submitted that the amendments to claims 1, 11, 18, 28 and 29 do not present any new issues that would require further consideration and/or search. Specifically, entry of this Amendment is proper under 37 C.F.R. §1.116 as the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not present any new issues that would require further consideration and/or search as the amendments merely amplify issues discussed throughout the prosecution; (c) do not present any additional claims without canceling a corresponding number of claims; and (d) place the application in better form for appeal, should an appeal be necessary. Entry of this Amendment is thus respectfully requested.

Claims 1-29 were rejected under 35 U.S.C. 102(b) as allegedly being anticipated by U.S. Patent 6,099,598 to Yokoyama et al. (“Yokoyama”). Applicant respectfully traverses the rejection.

Claim 1 recites an integrated lithographic fabrication cluster system comprising, *inter alia*, an exposure controller to control an exposure apparatus; a track controller to control a track apparatus; and a wafer handling controller to control a wafer handling apparatus, the wafer handling controller in direct communication through distinct communication lines with the exposure controller and the track controller.

It is respectfully submitted that there is nothing in Yokoyama that discloses, teaches or suggests *each and every limitation* of claim 1, including the features identified above. Applicant wishes to remind the Examiner that “the identical invention must be shown in as complete detail as is contained in the ... claim.” (See MPEP § 2131, citing Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989), emphasis added). MPEP § 2131 also indicates that “the elements must be arranged as required by the claim.” (See MPEP § 2131, citing In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990), emphasis added).

For example, the cited portions of Yokoyama fail to disclose, teach or suggest a lithographic apparatus that includes a wafer handling controller in direct communication through distinct communication lines with the exposure controller and the track controller.

Yokoyama is noted as providing control computers 802a to 802e connected to computer 805 by means of communication lines 807a and 807b. It is also stated on page 3 of the Office Action that “all the computers and memories are in communication with each other in one way or another through communication lines 807a through 807f.”

However, upon closer inspection of Figure 42 of Yokoyama, the wafer handling controller (identified by the Office Action as one of the processing modules 303-n to 307-n) in Yokoyama is not in direct communication with either the exposure controller or the track controller, nor does the wafer handling controller directly communicate with the exposure and the track controllers through distinct communication lines. (Emphasis added). As shown in Figure 2A of the present Application, for example, controllers 200A, 202A, 203A, and 204A are all in direct communication with each other. Further, each of the controllers in the present Application are shown as communicating through distinct communication lines. Yokoyama, rather, merely shows in Figure 42 a distributed control system in which the computers 802a-e are in direct communication only with the central computer 805 through the same communication lines. Yokoyama states “the control computers 802a to 802e are connected to a computer 805 for managing the general managing data base of the whole system by means of communication lines 807a and 807b.” (See col. 50, lines 62-65 of Yokoyama). As shown in Figure 42 of Yokoyama, communication line 807a connects the central computer 805 to the communication line 807b. The communication line 807b connects control computers 802a-e. Thus, Yokoyama fails to disclose, teach, or suggest the controller(s) in direct communication through distinct communication lines with at least one other controller. Therefore, the cited portions of Yokoyama fail to disclose the limitations of claim 1 of the present invention. Accordingly, the rejection is improper and should be withdrawn.

Claims 2-10 depend from claim 1, and, therefore, are submitted to be allowable for the reasons noted above, and for the features recited individually.

Claims 11 and 18 are patentable over Yokoyama for at least similar reasons as provided above for claim 1 and for the features recited therein. For example, claim 11 is patentable over Yokoyama at least because this claim recites an integrated lithographic fabrication cluster system comprising, *inter alia*, a wafer handling controller to control said wafer handling apparatus, the wafer handling controller in direct communication through

distinct communication lines with the exposure controller and the track controller. Claim 18 is patentable over Yokoyama at least because this claim recites a substrate manufacturing method comprising, *inter alia*, accessing, by said cluster controller, input control data from at least one of said exposure apparatus controller, said wafer handling apparatus controller, and said wafer track apparatus controller, to determine information required for operations by at least one of said exposure apparatus, said wafer handling apparatus, and said wafer track apparatus, respectively, the wafer handling controller in direct communication through distinct communication lines with the exposure controller and the track controller.

Similarly, claims 12-17 and 28 are dependent upon claim 11, and claims 19-27 and 29 are dependent upon claim 18, and, therefore, are submitted to be allowable for the reasons noted above, and for the features recited individually. With respect to claims 28 and 29, for example, as shown in Figure 2A, each of the controllers 200A, 202A, 203A, and 204A are in direct communication with one another through distinct communication lines.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-29 under 35 U.S.C. §102(e) based on Yokoyama is respectfully requested.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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